REMARKS

Applicants have read and considered the Office Action dated July 12, 2004 and the references cited therein.

Claims 1-5 and 14-18 were rejected under 35 U.S.C. Section 103(a) as being unpatentable over Bjorn (U.S. Patent No. 6,035,398), in view of Buffam (U.S. Patent No. 6,185,316), and further in view of Beatson *et al* (U.S. Patent No. 5,892,824). Applicants respectfully traverse the rejection for the following reasons:

Claim 1 recites a method for the separate authentication of a template and of user data inserted into this template. It includes the step of providing the actual template, a template ID and a Document Authentication Code DAC(t) linked to the template and based thereon. User data is then inserted into the template and later extracted there from. Another Document Authentication Code DAC(d) is generated, which is based on the user data by itself. Finally, all relevant information is stored in an Approval Data Packet ADP. This method advantageously allows a user to verify the authenticity of both the template without the user data therein, and the user data by itself, separately and independently. It is therefore possible to determine if one or the other has been tampered with.

Bjorn relates to a cryptographic key based on fingerprinting information. It discloses extracting fingerprint features from a fingerprint image, generating a template including these fingerprint features and generating a pair of keys related to this template, a "private" cryptographic key and a public key.

It is the Examiner's contention that Bjorn teaches a method for the separate authentication of a template in user data inserted therein, comprising the steps of:

a) providing the template, the template having a corresponding template ID and template Document Authentication Code DAC(t), DAC(t) being read on public key;

b) inserting the user data in the template;

c) extracting the user data from the template, where "user data" is read on "fingerprint features"; and

d) generating a user data Document Authentication Code DAC(d), which is read on "cryptographic key".

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The Examiner admits that Bjorn does not teach the template having a DAC(t) based on the template, but that Buffam discloses this feature. The Examiner also admits that Bjorn does not teach storing the template ID, DAC(t), the user data, and DAC(d) in an Approval Data Packet, but that this feature is taught by Beatson *et al*.

The Examiner argues that it would have been obvious for one skilled in the art to combine these three references to obtain the subject matter of claim 1.

With all due respect, Applicants assert that the Examiner is wrong in two respects. Firstly, in the interpretation of Bjorn as pertaining to a method for the separate authentication of a template and of user data inserted therein, and secondly in the contention that it would be obvious to combine all three references to obtain the claimed invention.

Regarding the authentication of documents, Bjorn is concerned with the authentication of a fingerprint image, Buffam aims to provide a secure identification of a user and Beatson *et al* aims to authenticate an electronic signature. None of the cited references, however, teaches or even suggests the separate authentication of two different documents, which is a template for receiving user data and that user data itself. It is the combination of these two different authentications that is new and inventive. In the prior art, documents created from inserting user data in a template may be authenticated, but there are no means provided to ensure that both the user data and the template separately used to create these documents are authentic; only the *end result* can be verified. In addition, storing the data authentication codes for both the template and the user data in an Approval Data Packet along with the template ID and the user data allows a user to later reconstitute the complete document while making sure that it comes from the right template having the right user data inserted therein.

Although the cited prior art separately shows some of the elements of claim 1, it does not suggest the advantageous combination thereof. As a matter of fact, there is no motivation to combine the template Document Authentication Code of Buffam with the user data Document Authentication Code of Bjorn since in each case, what has been identified as user data is in fact a template. This results from the word "template" being used in these documents to refer to a pattern that can be used to identify and match a scanned image, as opposed to a pre-designed document that contains formatting information or generic text as is the case in the present application. In other words, none of the cited prior art actually deals with two separate

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documents constituting a template and user data, and therefore there is no motivation to combine their teachings to provide separate authentication of two such documents.

In view of the above, Applicants assert that the subject matter of claim 1 patentably distinguishes over the cited prior art, and the Examiner is respectfully requested to withdraw the rejection.

Claim 14 also includes the inventive combination of elements of claim 1, and differs in that it additionally provides a Document Authentication Code for a complete document, created from inserting the user data in the template. Applicants assert that claim 14 also patentably distinguishes over the prior art. Applicants assert that the rejection of claims 1-5 and 14-18 is traversed.

Claims 6 and 19 were rejected under 35 U.S.C. Section 103(a) as being unpatentable over Bjorn (U.S. Patent No. 6,035,398) in view of Buffam (U.S. Patent No. 6,185,316) and further in view of Beatson *et al* (U.S. Patent No. 5,892,824) and still further in view of Weiss *et al* (U.S. Patent No. 6,071,190). Claim 6 depends from claim 1, while claim 19 depends from claim 14, which are believed to be allowable. Applicants respectfully traverse the rejection for the reasons stated above with regard to claims 1 and 14 as well as others.

Claims 7, 20 and 22 were rejected under 35 U.S.C. Section 103(a) as being unpatentable over Bjorn (U.S. Patent No. 6,035,398) in view of Buffam (U.S. Patent No. 6,185,316), and further in view of Beatson *et al* (U.S. Patent No. 5,892,824) and still further in view of Douglis *et al* (U.S. Patent No. 6,021,426). Claim 7 depends from claim 1, while claims 20 and 22 depend from claim 14, which are believed to be allowable. Applicants respectfully traverse the rejection for the reasons stated above with regard to claims 1 and 14 as well as others.

Claim 8 was rejected under 35 U.S.C. Section 103(a) as being unpatentable over Bjorn (U.S. Patent No. 6,035,398) in view of Buffam (U.S. Patent No. 6,185,316), and further in view of Beatson *et al* (U.S. Patent No. 5,892,824) and still further in view of Douglis *et al* (U.S. Patent No. 6,021,426), and yet further in view of Squilla *et al* (U.S. Patent No. 5,898,779). Claim 8 depends from claim 1, which is believed to be allowable. Applicants respectfully traverse the rejection for the reasons stated above with regard to claim 1 as well as others.

Claims 9 and 10 were rejected under 35 U.S.C. Section 103(a) as being unpatentable over Chang *et al* (U.S. Patent No. 6,105,012) in view of Buffam (U.S. Patent No. 6,185,316), and further in view of Beatson *et al* (U.S. Patent No. 5,892,824). Independent claim 9 includes all of

the inventive features discussed above with respect to claim 1 and differs there from in that instead of entering the user data directly in the template, it is simply linked thereto. Applicants assert that claims 9 and 10 art allowable for the reasons stated above as well as others.

Claim 11 was rejected under 35 U.S.C. Section 103(a) as being unpatentable over <u>Chang</u> <u>et al</u> (U.S. Patent No. 6,105,012) in view of <u>Buffam</u> (U.S. Patent No. 6,185,316), and further in view of <u>Beatson et al</u> (U.S. Patent No. 5,892,824), and still further in view of <u>Weiss et al</u> (U.S. Patent No. 6,071,190). Claim 11 is believed to allowable for the reasons stated above as well as others.

Claim 12 was rejected under 35 U.S.C. Section 103(a) as being unpatentable over <u>Chang</u> <u>et al</u> (U.S. Patent No. 6,105,012) in view of <u>Buffam</u> (U.S. Patent No. 6,185,316), and further in view of <u>Beatson et al</u> (U.S. Patent No. 5,892,824), and still further in view of <u>Douglis et al</u> (U.S. Patent No. 6,021,426). Claim 12 is believed to allowable for the reasons stated above as well as others.

Claim 13 was rejected under 35 U.S.C. Section 103(a) as being unpatentable over <u>Chang</u> <u>et al</u> (U.S. Patent No. 6,105,012) in view of <u>Buffam</u> (U.S. Patent No. 6,185,316), and further in view of <u>Beatson et al</u> (U.S. Patent No. 5,892,824), and yet further in view of <u>Douglis et al</u> (U.S. Patent No. 6,021,426), and still further in view of <u>Bjorn</u> (U.S. Patent No. 6,035,398) and yet further in view of <u>Squilla et al</u> (U.S. Patent No. 5,898,779). Applicants assert that even with hindsight, it would not be obvious to one of ordinary skill in the art to combine such a large number of references. Even so, the references are discussed above with regard to claims 1, 9 and 14, which are believed to be allowable. Applicants assert that claim 13 is allowable for the reasons stated above as well as others.

Claim 21 was rejected under 35 U.S.C. Section 103(a) as being unpatentable over <u>Bjorn</u> (U.S. Patent No. 6,035,398) in view of <u>Buffam</u> (U.S. Patent No. 6,185,316) and further in view of <u>Beatson et al</u> (U.S. Patent No. 5,892,824) and still further in view of <u>Douglis et al</u> (U.S. Patent No. 6,021,426) and yet further in view of <u>Squilla et al</u> (U.S. Patent No. 5,898,779). Applicants assert that claim 21 is allowable for the reasons stated above as well as others.
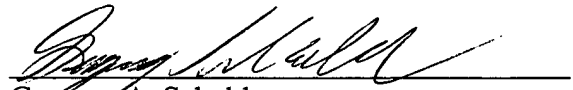
Claims 23-25 were objected to as being dependent upon a rejected base claim, but would be allowable if rewritten in independent form. Applicants thank the Examiner for the indication of allowable subject matter. However, Applicants assert that the base claim is allowable and choose not to rewrite the claims in independent form at this time.

In conclusion, it is believed that none of the cited prior art document, taken alone or combined, suggests the separate authentication of a template and of user data inserted therein, nor do they provide the combination of two separate data authentication codes respectfully based on this template and this user data. Therefore, the Examiner is respectfully requested to withdraw his objections and allow the present case.

Respectfully submitted,

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